

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS

CLEARLINE TECHNOLOGIES LTD.	§	
	§	
Plaintiff,	§	
	§	No. 4:11-cv-1420
v.	§	
	§	JURY DEMANDED
COOPER B-LINE, INC.	§	
COOPER INDUSTRIES PLC, and	§	
COOPER TECHNOLOGIES	§	
COMPANY,	§	
Defendants.	§	

DEFENDANT COOPER B-LINE, INC.'S INITIAL DISCLOSURES

i) The name and, if known, the address and telephone number of each individual likely to have discoverable information — along with the subjects of that information — that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;

Beth Bohnenstiehl
Cooper B-Line, Inc.
509 W. Monroe St.
Highland, IL 62249
(618) 654-2184

Ms. Bohnenstiehl may have knowledge of facts relating to Plaintiff's claim that Cooper B-Line has used and continues to use the C-PORT® mark at trade shows.

Jason Cook
Product Manager, Marketing
Cooper B-Line, Inc.
509 W. Monroe St.
Highland, IL 62249
(618) 654-2184

Mr. Cook may have knowledge of facts relating to Plaintiff's claim that Cooper B-Line has used and continues to use the C-PORT® mark at trade shows.

Margie Doll
Cooper B-Line, Inc.
509 W. Monroe St.
Highland, IL 62249
(618) 654-2184

Ms. Doll may have knowledge of facts relating to Plaintiff's claim that Cooper B-Line has used and continues to use the C-PORT® mark at trade shows.

Gary Griesbaum
Cooper B-Line, Inc.
509 W. Monroe St.
Highland, IL 62249
(618) 654-2184

Mr. Griesbaum may have knowledge of facts concerning service and supply issues in Cooper B-Line, Inc.'s relationship with Plaintiff.

Greg Jeckstadt
Cooper B-Line, Inc.
509 W. Monroe St.
Highland, IL 62249
(618) 654-2184

Mr. Jeckstadt may have knowledge of facts relating to Plaintiff's disparagement of Cooper B-Line, Inc.'s goods, services, and business.

Andrew Kamm
Cooper B-Line, Inc.
509 W. Monroe St.
Highland, IL 62249
(618) 654-2184

Mr. Kamm may have knowledge of facts regarding the technical aspects of DURA-BLOK™ products.

Joe Pace
Cooper B-Line, Inc.
509 W. Monroe St.
Highland, IL 62249
(618) 654-2184

Mr. Pace may have knowledge of facts concerning service and supply issues in Cooper B-Line, Inc.'s relationship with Plaintiff and concerning orders, shipment and sales of C-PORT® products.

MaryAnn Pasek
Cooper B-Line, Inc.
509 W. Monroe St.
Highland, IL 62249
(618) 654-2184

Ms. Pasek may have knowledge of facts relating to Plaintiff's claim that Cooper B-Line has used and continues to use the C-PORT® mark at trade shows.

Chris Peeler
Cooper B-Line, Inc.
509 W. Monroe St.
Highland, IL 62249
(618) 654-2184

Mr. Peeler may have knowledge of facts relating to all aspects of Cooper B-Line's relationship with Plaintiff.

David Rice
Cooper B-Line, Inc.
509 W. Monroe St.
Highland, IL 62249
(618) 654-2184

Mr. Peeler may have knowledge of facts relating to all aspects of Cooper B-Line's relationship with Plaintiff.

John Scime
Cooper B-Line, Inc.
509 W. Monroe St.
Highland, IL 62249
(618) 654-2184

Mr. Scime may have knowledge of facts regarding the technical aspects of DURA-BLOK™ products.

Mike Swiney
Cooper B-Line, Inc.
509 W. Monroe St.
Highland, IL 62249
(618) 654-2184

Mr. Swiney may have knowledge of facts regarding Plaintiff's claim that Cooper B-Line has used and continues to use the C-PORT® mark in meta-tags.

Connie Winkeler
Cooper B-Line, Inc.
509 W. Monroe St.
Highland, IL 62249
(618) 654-2184

Ms. Winkeler may have knowledge of facts concerning orders, shipment and sales of C-PORT® products;

(ii) A copy — or a description by category and location — of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment;

Defendant Cooper B-Line, Inc., at 509 W. Monroe St., Highland, IL, 62249, has the following documents, electronically stored information, and/or tangible items within its possession, custody, or control, some or all of which it may use to support his claims or defenses:

communications between Cooper B-Line, Inc. and Clearline Technologies, Ltd.;

communications within Cooper B-Line, Inc. relating to Clearline Technologies, Ltd.;

records regarding orders, shipment and sales of C-PORT® products;

exemplars of C-PORT® products;

exemplars of DURA-BLOK™ products;

promotional materials regarding C-PORT® products;

promotional materials regarding DURA-BLOK™ products;

publicly available information regarding GNR Technologies rubber car stop;

publicly available information regarding KeyCurb pipe supports.

(iii) A computation of each category of damages claimed by the disclosing party — who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered; and

None at this time.

(iv) For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

None.

Respectfully submitted,

/s/

Robin L. Harrison
Attorney-in-Charge
State Bar No. 09120700
Southern District No. 4556
John L. Dagley
State Bar No. 05310050
Southern District No. 12729
CAMPBELL HARRISON & DAGLEY L.L.P.
4000 Two Houston Center
909 Fannin Street
Houston, TX 77010
(713) 752-2332
(713) 752-2330 (fax)

ATTORNEYS FOR DEFENDANT
COOPER B-LINE, INC.

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2011, I served these disclosures on opposing counsel by certified mail, return receipt requested, addressed as follows:

Robert D. Katz
Jon B. Hyland
Patton Roberts, PLLC
901 Main Street, Suite 3300
Dallas, Texas 75202

/s/

John L. Dagley